

GEORTO, INC. v. WILLIAM GATEMAN v. ROBERTS CORPORATION, U.S. DIST. COURT, MASS., CIVIL ACTION NO: CV-04-11730-NG

FINAL JOINT EXHIBIT LIST

Trial Exhibit Number	Description <u>Agreed Exhibits Admitted As Evidence At Trial</u>	Exhibit Date	Bates No. Range	Sponsoring Party	Objection By	Date Admitted
1	Stipulated facts			JOINT		9/11/2006
2	Selected Site Plans / Schematics / Maps, including but not limited to selected deposition exhibits			GEO-1A / GAT-4		" "
	2A: Existing Conditions Plan, prepared by Eastern Land Survey Associates					" "
	2B: Proposed Conditions Plan, prepared by Eastern Land Survey Associates					" "
	2C: Site Plan, with handwritten notations					" "
	2D: Sanborn Map, as appearing in GEC Phase I Report (Figures)					" "
	2E: Harding Lawson Associates Site Sketch as seen on April 19, 2002					" "
	2F: Harding Lawson Associates Site Sketch as seen on May 23, 2002					" "
3	Photographs of property, including selected deposition exhibits, photos in reports, photos produced by Family Dollar			GEO-1B / GAT-5		" "
	3A 1-3: Photographs of building after fire, produced by Family Dollar					" "
	3B: Photographs taken by Lauren McKinlay of Goldman Environmental on May 2, 2002 (also contained in GEC Phase 1 Report Appendix C)					" "

	3C 1-172: Photographs taken by Harding Lawson Associates April 18, 2002 -- June 6, 2002					" "
	3D 1-3: Photographs taken on January 16, 2003					" "
	3E 1-4: Photographs taken summer 2003					" "
	3F 1-6: Photographs, produced by Family Dollar					" "
	3G 1-5: Photographs taken by James Hawkins April 2004					" "
	3H 1-31: Photographs taken by Stephen McIntyre April 2004					" "
	3I 1-5: Photographs taken by William Gateman					" "
4	Declaration of Trust Establishing 200 Union Street Realty Trust	12/18/1996			GEO-1G	" "
5	Deed of Purchase of Union Street Property by William Gateman	12/18/1996			GAT-12 / ROB-12	" "
6	Selected documents from City of Lynn Building Department file re property				GEO-2V	" "
7	Demolition Permit dated October 9, 2001	10/9/2001	P0608		GEO-1L	" "
8	Letter dated March 4, 2002 from Francis Calnan to William Gateman	3/4/2002			GEO-1M	" "
9	Roberts-Gateman contract dated March 12, 2002	3/12/2002	ROB000069		GEO-1N / GAT-2 / ROB-1	" "
10	Demolition Applications	3/14/2002	ROB000009 - ROB000012		GEO-2A	" "
11	ROB-9. Roberts Corporation's Invoice, Accounting Records, and Receipt Payment Regarding Demolition of 200 Union Street, Lynn, MA	3/12/2002 - 7/1/2002	ROB000070 - ROB000079; ROB000083 - ROB000088		GEO-10 / ROB-9 / GAT-9	" "
12	Roberts Corporation Daily Tracking Reports	3/14/2002 - 6/5/2002	ROB000006 - ROB000008		GEO-2E / ROB-4	" "
13	Roberts Corporation Daily Job Reports	3/26/2002 - 4/12/2002	ROB000039 - ROB000051		GEO-2E / ROB-4	" "

14	Roberts Corporation's Documents Concerning Asbestos Removal from 200 Union Street, Lynn, MA	3/14/2002 - 5/9/2002	ROB0000036 - ROB0000038; ROB0000052 - ROB0000067; ROB0000080 - ROB0000082	ROB-8	" "
15	Roberts Corporation's Landfill Receipts for Loads of Demolition Removed from 200 Union Street, Lynn, MA	4/1/2002 - 4/12/2002	ROB0000017 - ROB0000035	ROB-7	" "
16	Family Dollar Contract for Purchase and Sale of Real Estate	4/26/2002		ROB-11 / GAT-11	" "
17	Fax transmission from Gateman to Family Dollar dated May 7, 2002	5/7/2002		GEO-2C	" "
18	Deed of Purchase of Union Street Property by Family Dollar			GAT-11 / ROB-11	" "
19	Contract for Purchase and Sale of Real Estate dated June 18, 2003 between Gateman and Georto	6/18/2003		GEO-1C / GAT-3 / ROB- 2	" "
20	GEC Phase I Environmental Site Assessment	5/29/2002		GEO-1H / GAT-3	" "
21	Contract for Purchase and Sale of Real Estate dated April 26, 2002 between Gateman and Family Dollar, as faxed to Georto by Gateman's counsel on July 7, 2003	7/7/2003	P0454 - P0472	GEO-1K	" "
22	GEC Reliance Letter to James Hawkins dated December 11, 2003, with fax cover sheet	12/11/2003	P0680	GEO-1i / GAT-7	" "
23	GEC Report dated February 2, 2004	2/2/2004	P0691 - P0716	GEC-2J / GAT-8	" "
24	AIA Contract PM-Georto	2/3/2004	P0327 - P0343	GEO-2N	" "
25	Fax from PM Construction to Paul Yasi dated February 6, 2004	2/6/2004		GEO-2K	" "
26	Trustee's Certificate dated February 9, 2004	2/9/2004		GEO-1E	" "
27	Indemnification Agreement dated February 9, 2004	2/9/2004		GEO1-F	" "

28	GEC Reliance Letter to KeyBank in care of James Hawkins dated February 11, 2004	2/11/2004	P0741 - P0752	GEC-1J		" "
29	KeyBank loan closing documents	2/19/2004	P1466 - P1595	GEO-2M		" "
30	Quitclaim Deed of Purchase of Union Street Property by Georto, Inc. recorded February 20, 2004	2/20/2004		GEO-1D / GAT-10 / ROB-10		" "
31	Demand letter to Gateman from D. Kerester dated April 26, 2004	4/26/2004	P0986 - P0987	GEO-1R		" "
32	Proposals submitted to PM Construction for Removal of Debris	5/1/2004		GEO2Q		" "
33	Letter dated May 6, 2004 from PM to James Hawkins and enclosures	5/6/2004		GEO-2R		" "
34	Communications from PM to Georto regarding change order for removal of demolition debris		P0049 - P0061; P0021 - P0029	GEO-2S		" "
35	Change Order / work authorization for removal of demolition debris	6/21/2004; 6/7/2004		GEO-1P		" "
36	Georto check to PM Construction for removal of debris per change order	7/10/2004	P0048	GEO-1Q		" "
37	Selected PM Construction documents (costs, application for payment, payments, subcontractor change orders, subcontractor invoices, etc.)			GEO-2T		" "
38	Letter from Jack Anetakis to Gateman dated September 13, 2004	9/13/2004		GEO-1T		" "
39	S.W. Cole Geotechnical Engineering Evaluation dated May 13, 2004	5/13/2004	P0876 - P0892	GEO-1S		" "
40	Supplemental S.W. Cole report dated December 20, 2005	12/20/2005		GEO-1S		" "
41	Solid Waste Report of Gregory C. Wirsén, MSc., dated December 28, 2005	12/28/2005		GEO-1S		" "
42	ROB-13. Documents concerning Insurance Proceeds Received by William Gateman for Union Street Property [Intentionally Left Blank]			ROB-13		" "
43	Documents regarding property taxes owed by Gateman	8/26/2004	P09893 - P0899	GEO-1U / ROB-15	GAT (withdrawn)	" "

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